UTAH DIVISION OF SOLID AND HAZARDOUS WASTE
USED OIL TRANSFER FACILITY PERMIT

ABSTRACT: ***Safety-Kleen Systems, Inc.(Safety-Kleen) operates a used oil transfer facility located at 1066 South Pioneer Road, Salt Lake City, Utah, where it manages used oil in drums and/or totes that have been collected by box trucks and stores these containers of used oil in covered warehouse storage areas prior to shipping the used oil to other facilities for processing. This permit allows Safety-Kleen to store used oil for not longer than 35 days in the following areas:***

a) The permitted hazardous waste container storage area, and
b) other portions of the facility that are secured from the public and have concrete secondary containment sufficient to hold 110% of the contents of the largest container being stored.
c) The volume of used oil containers stored in approved locations shall not exceed 1,980 gallons

Safety-Kleen was originally approved to operate at this location on October 1, 1997, to store used oil in two areas. A request to modify the original permit was initially received by the Division on September 24, 2007.

PERMITTEE NAME:	Safety-Kleen Systems, Inc.
PERMITTEE MAILING ADDRESS:	5360 Legacy Drive, Building 2, Suite # 100 Plano, TX 75024
PERMITTEE CONTACT:	Randy Shaner, EHS Manager Cell: (402) 630-4261 Fax: (703) 783-8634 E-Mail: randy.shaner@safety-kleen.com
FACILITY ADDRESS:	1066 South Pioneer Road Salt Lake City, UT 84104
FACILITY CONTACT:	Mike Blanchard, Branch Manager Phone: (801) 975-0742 Fax: (801) 972-6882
PERMIT #:	UOP-0047
EPA I.D. #:	UTD980957088

By this permit to operate, Safety-Kleen Systems, Inc. (hereafter referred to as Permittee) shall be subject to the following conditions:

1. General.
The Permittee shall transport, store and manage used oil in accordance with all applicable requirements of R315-15 of the Utah Administrative Code (UAC) and of the Used Oil Management Act (The Act), 19-6-701 et seq, Utah Code Annotated.

2. Permit Revocation.
Any noncompliance with the permit or the UAC or the Act, other than activities authorized by a variance granted by the Executive Secretary of the Utah Solid and Hazardous Waste Control Board (Executive Secretary), constitutes a violation and may be grounds for enforcement action or permit revocation.

3. Permit Modifications.
a. Modifications to this permit shall only be authorized by the Executive Secretary.
b. The Executive Secretary may make modifications as necessary, or as a result of statutory or regulatory changes.
c. If the Permittee wishes to request modifications to any item or activity covered by this permit, the Permittee shall submit a written permit modification request to the Executive Secretary. If the Executive Secretary determines any modification request is substantive, a public hearing, a 15-day public comment period or both may be required before the modifications are approved.
d. Implementing modifications prior to the Executive Secretary's approval constitutes a violation of the permit and may be grounds for enforcement action or permit revocation.

4. Used Oil Operations.
a. The Permittee shall transfer, store, and manage used oil in the manner and following the methods and procedures described in the attachments to this permit.
b. The Permittee shall not store used oil from its customers at this transfer facility for more than 35 days without first obtaining a used oil processor or re-refiner permit from the Executive Secretary.

5. Maintenance and Spill Prevention.
a. The Permittee shall maintain and operate all used oil associated equipment and facilities to minimize the possibility of fire, explosion or sudden or non-sudden release of used oil to air, soil, or surface water which could threaten human health and the environment.
b. The Permittee shall inspect and maintain used oil equipment, tanks, containers, storage units, and transportation vessels on a regular basis to insure compliance with this section.
c. Used oil drips, spills and releases shall be identified and cleaned up immediately, and corrective measures shall be taken to prevent future releases.
d. Used Oil Transfer Facilities are subject to all applicable Spill Prevention, Control and Countermeasures as defined in 40 CFR 112.

6. Record Retention.
The Permittee shall maintain all applicable used oil transfer facility associated records required by R315-15 UAC and all records required by this permit at the location listed in Attachment 1 "General Used Oil Operations," for a minimum of three years. Records may be in hard copy or electronic format and must be readily accessible for inspection.

7. Rebuttable Presumption/Sampling and Statistical Analysis.
The Permittee shall follow Attachment 2 "Analysis/Rebuttable Presumption," which describes procedures to be used by the Permittee to comply with the analysis requirements of R315-15-4.5 UAC.

8. Prohibited Waste.
a. No quantity of hazardous waste, as defined by R315-1 and R315-2 UAC, or PCBs, as defined by R315-301-2(52) UAC, shall be mixed with used oil by the Permittee.
b. If the transfer facility will be handling any used oil from transformers, including dielectric oil and mineral oil, or any equipment that may include PCBs, the oil must be tested to determine the PCB concentration and managed as PCB waste if so dictated by the analysis.
c. Used oil shall not be stored in tanks, containers, storage units, and transportation vessels previously used to transport or store hazardous waste unless these tanks, containers, storage units, and transportation vessels have been appropriately emptied and cleaned in accordance with R315-2-7.

9. Used Oil Transfer, Storage and Management.
a. The Permittee shall only use a used oil transporter with a current used oil transporter permit and a current Used Oil Handler Certificate issued by the Executive Secretary to deliver or collect used oil in quantities exceeding 55 gallons to or from this transfer facility.
b. The Permittee and any used oil transporter delivering to or collecting from the transfer facility shall, at a minimum, follow the specific procedures listed in Attachment 3 "Transfer Procedures" when delivering, collecting or transferring (loading/unloading) used oil at this transfer facility.
c. All used oil deliveries and collections to and from this facility will be documented at the time they occur with a completed bill-of-lading or equivalent document.
d. The Permittee shall be allowed to transfer, store, and manage used oil using the tanks, containers, storage units, and transportation vessels listed in Attachment 4 "Storage Containers," in the manner described in that attachment, and using the secondary containment units described in Attachment 5 "Secondary Containment."
e. The Permittee may not begin transfer, storage, and management of any used oil in additional tanks, containers, storage units, and transportation vessels until the Executive Secretary has approved the additional tanks, containers, storage units, and transportation vessels including associated procedures and amended this permit in writing.

10. Emergency Controls/Spill Plan.
a. The Permittee shall take all reasonable steps to minimize releases to the environment and shall carry out such measures as are necessary to protect human health and the environment. The Permittee shall comply with all applicable requirements of R315-15-9 UAC.
b. In the event of a release of used oil, the Permittee shall immediately take appropriate action to minimize the threat to human health and the environment. It shall not constitute a defense, for

the Permittee in an enforcement action, that it would have been necessary to halt or reduce the Permittee business activity in order to maintain compliance with the conditions of this permit.
c. The Permittee and any used oil transporter delivering to or collecting from the transfer facility shall follow the Emergency Controls required by R315-15-9 UAC and the procedures listed in Attachment 6 "Spill Plan."

11. Used Oil Training.
The Permittee shall follow the training and documentation procedures listed in Attachment 7, "Training."

12. Waste Disposal.
All wastes generated during used oil operations will be handled according to procedures outlined in Attachment 8, "Waste Disposal," and the wastes will be taken to an appropriate facility permitted to handle the type of waste generated.

13. Liability Coverage/Financial Requirements.
a. The Permittee shall maintain general liability coverage for any liability resulting from the Permittee's operations (e.g., bodily injury property damage) arising from any operations conducted at this Transfer Facility as required by R315-15-10 UAC and Attachment 9 "Liability Coverage."
b. The Permittee shall maintain third-party environmental pollution liability coverage for accidental spills or mishandlings of used oil and damage to third parties arising from any operations conducted at this Transfer Facility as required by R315-15-17 UAC and Attachment 9 "Liability Coverage."
c. Changes in extent, type, or amount of the liability coverage or any change in the insurer(s) shall be considered a permit modification requiring notification to and approval from the Executive Secretary.
d. The Permittee shall provide the Executive Secretary with documentation before the expiration date of the current general liability coverage and the third-party environmental pollution liability coverage to verify coverage is being maintained and renewed. Documentation of the current general liability and environmental pollution liability coverage is in Attachment 9, "Liability Coverage."

14. Used Oil Handler Certificate.
a. The Permittee shall pay an annual used oil handler fee by December 31 of each year to obtain a Used Oil Handler Certificate from the Executive Secretary for the subsequent calendar year.
b. In accordance with R315-15-4.1 UAC, the Permittee shall not operate a used oil transfer facility without obtaining and maintaining a current used oil Handler Certificate.

15. Inspection and Inspection Access.
a. Upon reasonable notice from the Executive Secretary, the Permittee shall provide, in Utah, all

applicable records of its Utah used oil operations for inspection. Any duly authorized officer, employee, or representative of the Utah Solid and Hazardous Waste Control Board, may have access to and the right to copy any records relating to used oil for the purpose of ascertaining compliance with the applicable provisions of R315-15 UAC and the Used Oil Management Act (19-6-701, et seq.).
b. Any duly authorized officer, employee, or representative of the Utah Solid and Hazardous Waste Control Board, may, at any reasonable time and upon presentation of appropriate credentials, enter upon and inspect any property, premise, or place on or at which used oil is generated, transported, stored, treated or disposed of, and these officers, employees or representatives may also inspect any used oil operations, transportation vehicles, equipment and associated documents.
c. A record of the inspection may be made by photographic, videotape, electronic or other reasonable means.
d. Where such an inspection involves entry to the Permittee's property, the duly authorized officer, employee, or representative of the Utah Solid and Hazardous Waste Control Board shall provide the opportunity to have a representative of the owner, operator, or agent in charge of the Permittee's facility to be present.

16. Reporting.
As required by R315-15-13.4 UAC, the Permittee shall prepare and submit an Annual Report to the Executive Secretary by March 1 of the following year which shall include the information required by the Annual Report for Used Oil Transporters and Transfer Facilities (Form UO 004). Annual Reports shall include the operational status of the transfer facility until such time cleanup and closure of the facility has been completed.

17. Cleanup and Closure Plan.
a. In the event this facility is no longer operating as a used oil transfer facility, procedures described in Attachment 10, "Cleanup and Closure Plan" will be followed to comply with requirements of R315-15-11 UAC.
b. Any transfer facility changes affecting the Cleanup and Closure Plan shall be approved by the Executive Secretary.

18. Financial Assurance for Cleanup and Closure.
a. The Permittee shall obtain and maintain financial assurance as required to cover costs outlined in the "Cleanup and Closure Plan" and comply with all applicable requirements of R315-15-12 UAC.
b. The minimum required financial assurance amount shall be recalculated annually, at the beginning of each new calendar year, for inflation. If the Permittee's financial assurance amount falls below the newly adjusted minimum coverage, an increase in coverage shall be required to at least meet the new minimum amount. This increased amount shall be due by March 1 of each calendar year.
c. The financial assurance mechanism amount in Attachment 11, "Financial Assurance" shall be

increased if a "Cleanup and Closure Plan" modification increases the closure cost estimate above the current financial assurance mechanism amount.

19. Other Laws.
Nothing in this permit shall be construed to relieve the Permittee from the Permittee's obligation to comply with any Federal, State, or local law.

20. Transfer of Permit.
This permit may not be transferred to another party or parties without prior written approval of the Executive Secretary.

21. Effective Date.
This permit shall become effective on the date the permit is signed by the Executive Secretary.

Signed _____ Date _____, 2009

Dennis R. Downs, Executive Secretary
Utah Solid and Hazardous Waste Control Board

Safety-Kleen Systems, Inc.
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ATTACHMENT 1

General Used Oil Operations

The Permittee, or another Utah-permitted used oil transporter operating under a current Utah used oil transporter permit, will transfer used oil in drums/totes and licensed trucks into and out of the Permittee's used oil transfer facility located at 1066 S. Pioneer Road, Salt Lake City, Utah.

The Permittee shall only store used oil in containers meeting the used oil storage requirements in R315-15-4.6 UAC and in the following areas:

a) The permitted hazardous waste container storage area, and
b) Other portions of the facility that are secured from the public and have concrete secondary containment sufficient to hold 110% of the contents of the largest container being stored.

The volume of used oil containers stored in approved locations shall not exceed 1,980 gallons.

Personnel will be trained annually in proper used oil handling procedures. Measures will be taken to prevent oil spills, and any accidental spills that may occur will be immediately cleaned up and reported as required.

All used oil transfer and testing records will be maintained at the Permittee's Pioneer Road facility for a minimum of three years. Records may be in hard copy or electronic format and must be readily accessible for inspection.

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ATTACHMENT 2

Analysis/Rebuttable Presumption

The Permittee will follow the used oil sampling (analysis/rebuttable presumption) plan in its current Used Oil Transporter Permit, UOP-0050.

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ATTACHMENT 3

TRANSFER PROCEDURES

Loading and unloading at the Pioneer Road location is only done with used oil in closed containers. There is no bulk transfer of Safety-Kleen customer used oil at this facility. Employees will be properly trained and all precautions will be taken to avoid accidental spills during loading and unloading of used oil containers.

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ATTACHMENT 4

STORAGE CONTAINERS

The Permittee shall only store used oil in containers meeting the requirements of R315-15-4.6 UAC in the following areas:

a) The permitted hazardous waste container storage area, and
b) Other portions of the facility that are secured from the public and have concrete secondary containment sufficient to hold 110% of the contents of the largest container being stored.

The volume of used oil containers stored in approved locations shall not exceed 1,980 gallons. All containers will be maintained in good condition and clearly labeled with the words "Used Oil".

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ATTACHMENT 5

SECONDARY CONTAINMENT

All used oil containers will be stored inside the covered warehouse areas. The secondary containment systems will be maintained free of liquid and debris. All liquid collected in the containment systems will be removed within 24 hours of discovery.

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ATTACHMENT 6

SPILL PLAN

The Permittee will follow the emergency spill response procedures below in the event of a used oil spill.

A. If possible, ***stop the source and migration of the release*** (close valve, upright drum, cover any storm drains, etc.)**.**

B. Sound the alarm – Let those in the immediate area know there is a spill.

C. Secure the Spill Site
1. Ensure that there is No Smoking in the incident area.
2. Prevent access to spill area to keep any one from walking or driving through it.

D. Assess the Situation
1. Estimate the quantity of used oil released.
2. Determine the extent of the contamination from the spill, i.e. did it reach soil, surface water or sewers and what are the approximate dimensions of the contaminated area.
3. Determine if adequate equipment is readily available in the truck spill kit or at the incident site to contain and clean up the released material. If not, include a request for the required supplies when you notify the branch manager.

E. Notify
1. Contact the facility's Branch Manager or designee if the spill is in excess of 8 fluid ounces.
2. If the spill is 25 gallons or greater, the Branch Manager will also notify the Utah Department of Environmental Quality, 24-hour Answering Service, 801-536-4123 and follow the requirements contained in R315-15-9.1.
3. Give notice, if required by 49 CFR 171.15, to the National Response Center, 800-424-8802 or 202-426-2675.

F. Clean Up the Release
Pump out or absorb any free liquids, absorb oil from asphalt/concrete surfaces and remove contaminated materials.

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ATTACHMENT 7

TRAINING

The Permittee shall provide and document spill plan training for the licensed drivers of the transportation and delivery trucks and facility personnel associated with the used oil operation. This training will include identification of used oil, proper loading and unloading procedures, used oil sampling and testing procedures with a *Clor-D-Tect* test kit, spill plan requirements, and personal safety and protection.

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ATTACHMENT 8

WASTE DISPOSAL

All absorbent materials and rags used to clean up minor leaks and spills and wipe off equipment will be collected and stored in appropriate waste containers. Used *Clor-D-Tect* test kits and oil samples will be placed into waste containers. The full waste containers will be shipped off-site to an appropriately permitted disposal facility.

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ATTACHMENT 9

LIABILITY COVERAGE

The Permittee will maintain the general liability insurance coverage required by R315-15-10 UAC and the third-party environmental pollution insurance coverage with the Utah endorsement language required by R315-15-17 UAC. An original signed duplicate or certified duplicate of the policy will be provided to the Division along with annual proof of renewal prior to the expiration date.

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ATTACHMENT 10

CLEANUP AND CLOSURE PLAN

This section describes the procedures to be undertaken to properly cleanup and close the areas of Safety-Kleen's Pioneer Road facility that are used to transfer used oil to its final destination in accordance with the Utah regulations for management of used oil (R315-15 UAC).

Overview

There are two main locations where used oil containers are stored:

1. in the area south of the Northeast overhead door in the warehouse, outside of the product cage and up to the walkway in front of the sales office, and
2. in the permitted hazardous waste container storage area.

These are both in the warehouse that is under the same roof as the office. There are no used oil tanks at the site. Facility cleanup and closure activities, as described in this Attachment, will be conducted in accordance with applicable regulatory requirements.

Cleanup and closure involves removing the used oil inventory by shipping it offsite and decontaminating and cleaning the secondary containment surfaces where the used oil was stored. In this case the used oil is stored in containers that can be loaded onto trucks to be transported and the containment areas can be cleaned with detergent and water. As part of closure of the facility, the procedures and activities undertaken will be documented and compiled into a cleanup and closure report. If clean up of the facility has defaulted to the responsibility of the Executive Secretary, costs will be included in the closure report. At the time of this approval, the closure costs are estimated to be $52,442, as detailed in Attachment 12 "Closure Cost Estimate."

Cleanup and Closure of the Used Oil Pioneer Road Transfer Facility

This section presents guidelines for closure of the used oil container transfer areas. Guidelines are presented for the following closure activities:

- Preparation for transport of used oil containers;
- Cleaning of secondary containment surfaces;
- Proper disposal of material generated during closure.

Safety Considerations

General safety procedures to clean equipment will be implemented as well as the safe handling of containers.

Removal of Used Oil Inventory from Site

Used oil containers will be prepared for transport during facility closure activities. The used oil containers will be loaded onto trucks and transported to an appropriate used oil management facility.

Cleaning of Ancillary Equipment

There is no ancillary equipment to be cleaned and closed.

Cleaning of Secondary Containment Surfaces

After the used oil containers have been removed from the site, the secondary containment surfaces will be, if there is residue of used oil on them, decontaminated using a detergent solution. Following cleaning, the surfaces will be rinsed with clean/tap water. Rinse waters generated during the cleaning operation will be containerized and appropriately managed in accordance with applicable regulations and transported off-site for treatment. The closure cost estimate assumes the use of detergent solvent and a clean water rinse.

Management of Materials Generated During Closure

There are a number of materials that will require proper handling during and after closure. These include:

- Used oil / Oily Water inventory;
- Wash and rinse water; and
- Equipment and protective clothing.

As stated previously, used oil and oily water in inventory will be prepared for transport by making sure all containers are in good condition, properly closed and labeled, loading them on a truck and transporting them to an appropriate used oil management facility. Rinse water generated from cleaning ancillary equipment and containment structures will be contained and transported offsite for processing in accordance with applicable regulations.

Equipment used during the closure process will be decontaminated at a temporary decontamination structure or over secondary containment. Rinse water generated by equipment cleaning will also be containerized and transported offsite for processing in accordance with applicable regulations. Disposable equipment and protective clothing utilized during closure activities will be properly containerized and disposed of off-site at an appropriately permitted facility.

Closure Report

Closure activities will be described in a closure report. The report will include documentation of the closure process, the removal of the used oil inventory, and the decontamination of equipment and containment surfaces. If closure has defaulted to the Executive Secretary, the report will include closure costs. Notes and photos may be included as part of the closure documentation.

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ATTACHMENT 11

FINANCIAL ASSURANCE

The Permittee shall obtain and maintain financial assurance as required to cover the costs outlined in the "Cleanup and Closure Plan" and comply with all applicable requirements of R315-15-12 UAC. The minimum required financial assurance amount shall be recalculated annually for inflation at the beginning of each new calendar year. If the Permittee's financial assurance amount falls below the newly adjusted minimum coverage, an increase in coverage shall be required to at least meet the new minimum amount. This increased amount shall be due no later than March 1 of each calendar year. The financial assurance shall also be increased if a modification to the Cleanup and Closure Plan increases the closure cost estimate above the current financial assurance amount.

The cleanup and closure cost estimate shall be revised prior to final closure of the permitted hazardous waste facility at this site should the permitted hazardous waste facility be closed and the used oil transfer facility remain open.

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ATTACHMENT 12
CLOSURE COST ESTIMATE

Closure Cost Estimate Worksheet, Used Oil Transfer Facility, Safety-Kleen Systems, Inc., Pioneer Road Service Center, Salt Lake City, UT

	Activity	Category	Hourly Rate or Unit Charge	Hours or Unit Estimate	Subtotal
1	**PROJECT COORDINATION AND SCHEDULING**				
	Prime Contractor Costs (note 1)				
	- Obtain subcontractor quotes to implement closure activities	Project Manager	$94	6	$564
	- Coordinate scope and schedule of project activities with owner/operator, decontamination contractor, regulatory agencies and analytical laboratory	Project Manager	$94	4	$376
	- Review facility permit and closure plan	Project Engineer	$94	6	$564
		Field Supervisor	$75	12	$900
	- Prepare project/site specific Health and Safety Plan	Health/Safety Specialist	$94	6	$564
	- Participate in on-site coordination and orientation meeting with owner/operator and decontamination contractor	Project Manager	$94	2	$188
	- Prepare project activity and project status reports	Project Manager	$94	4	$376
	- Office Expenses		$100	1	$100
	- Miscellaneous Expenses		$100	1	$100
	Activity 1. Subtotal				**$3,732**
2	**MOBILIZE TO SITE AND PREPARE FOR CLOSURE/CLOSURE OVERSIGHT AND SHIP USED OIL CONTAINERS (note 12)**				
	Assumptions				
	- Permitted used oil storage capacity capacity (1,980 gallons (note 11) or 36, 55-gallon drums)				
	- Waste oil transported to Aragonite, UT. Unit cost is based on $200 per 55-gallon drum and includes treatment and disposal.				
	- Generator knowledge used for disposal/treatment of used oil (i.e. no sampling required). However, 2 waste characterization samples are conservatively included.				
	- Waste haulers costs to transport drums to reclaimer based on RS Means. Documentation of unit costs provided in notes at the end of the cost estimate				
	- Prime Contractor per diem includes rental car, room and meals				
	- Subcontractor costs include labor and all expenses to complete each task				
	- Onsite closure activities completed in 7 working days, Project Engineer on site for 4 days for inspection/closure activities				
	Prime Contractor Costs (note 1)				
	- Project Management and Supervision	Project Manager	$94	2	$188
	- Supervise waste loading activities	Field Supervisor	$75	10	$750
		Travel	$1,000	1	$1,000
		Per diem (all activities)	$150	7	$1,050
	- Collect representative waste characterization sample of drummed wastes	Field Supervisor	$75	1	$75
		Supplies/Shipping	$150	1	$150
	Subcontractor Costs (note 2)				
	- Subcontractor mobilization/demobilization and licensing	Lump Sum	$10,000	LS	$10,000
	- Transfer drums in CSA to trucks	Foreman/labor/equipment	$365	LS	$365
	- Transport drums to TSD for Treatment/Disposal				
	Assumes 1 trucks to transport 36 drums (80/trailer)				
	Drum Transportation at $800/load (note 7)	Drum Transport	$800	1	$800
	Fuel Surcharge (UDEQ Request)	20%	$160	1	$160
	Aragonite State Fees $28/ton	State Fees	$28	7	$202
	Estimated disposal/treatment cost (per drum) - $90/drum (note 4)	Disposal of drums	$90	36	$3,240
	Laboratory Subcontractor Costs				
	- Waste characterization sample analysis (note 3)				
	Waste characterization analysis to consist of TCLP VOCs, SVOCs and Metals		$811	2	$1,622
	Sales tax	7%	$57	2	$114
	Sample Shipment (note 8)		$365	1	$365
	Activity 2. Subtotal				**$20,080**

3 DECONTAMINATE ONE CONTAINER STORAGE AREA (note 13)

Assumptions:
- CSA located inside warehouse and consists of a concrete slab floor with curbing and trench and is approximately 840 sq. ft.
- Decontamination shall consist of washing with a high-pressure detergent/water solution and rinsing with tap water
- CSA to remain in-place following closure
- Prime Contractor project engineer and field supervisor travel accounted for in above activities
- Prime Contractor per diem includes rental car, room and meals
- Subcontractor costs include labor and all expenses to complete each task

Prime Contractor Costs (note 1)				
- Inspect the floor of CSA for cracks, gaps, or other potential lapses of integrity	Project Engineer	$94	2	$188
- Fill cracks and gaps (if necessary) prior to implementing decontamination	Field Supervisor	$75	2	$150
- Supervise and document decontamination of CSA	Field Supervisor	$75	6	$450
Subcontractor Costs (note 2)				
Decontaminate 1 container storage area Assumes decontamination with detergent/water solution, and scrubbing with brooms, mops, etc., and rinsing with high pressure spray. Wash/rinse water containerized and transferred to drums Cost for transportation and disposal of drums included in Activity 8 below.	Foreman/labor/equipment	$900	LS	$900
Activity 3. Subtotal				**$1,688**

4 DECONTAMINATE THE OTHER STORAGE LOCATION IN WAREHOUSE (note 13)

Assumptions:
- Washing shall consist of a high-pressure detergent/water solution and rinsing with tap water. Approximately 380 sq. ft.
- Prime Contractor project engineer and field supervisor travel and per diem accounted for in above activities
- Prime Contractor per diem includes rental car, room and meals
- Subcontractor costs include labor and all expenses to complete each task

Prime Contractor Costs (note 1)				
- Supervise and document removal of residual sludges (if necessary)	Field Supervisor	$75	4	$300
- Supervise washing of secondary containment surfaces outside the CSA but in the Warehouse	Field Supervisor	$75	8	$600
- Inspect containment and document with field notes and photographs	Project Engineer	$94	2	$188
Subcontractor Costs (note 2)				
Decontaminate secondary containment surfaces Assumes decontamination with detergent/water solution, and scrubbing with brooms, mops, etc., and rinsing with high pressure spray. Wash/rinse water containerized and transferred to drums Cost for transportation and disposal of drums included in Activity 8 below.	Foreman/labor/equipment	$2,900	LS	$2,900
Activity 4. Subtotal				**$3,988**

5 DECONTAMINATE CLEANUP EQUIPMENT (If Necessary) (note 13)

Assumptions:
- Decontamination of Cleanup Equipment is not anticipated to be necessary. Equipment used to remove waste units will only be used following decontamination of the unit (i.e. equipment will not come into contact with used oil). Other cleanup equipment such as pressure washers will be cleaned during decontamination of each respective unit.
- If performed, washing of cleanup equipment shall consist of a high-pressure detergent/water solution and triple rinsing with tap water

Prime Contractor Costs (note 1)				
- Supervise washing of cleanup equipment	Field Supervisor	$75	4	$300
Subcontractor Costs (note 2)				
- Construct decon area with 6ml plastic sheeting and 4" absorbent berm	Foreman/labor/equipment	$500	LS	$500
- Decontaminate cleanup equipment Assumes decontamination with detergent/water solution, and scrubbing with brooms, mops, etc., and rinsing with high pressure spray. Wash/rinse water containerized and transferred to drums Cost for transportation and disposal of drums included in Activity 8 below.				
Activity 5. Subtotal				**$800**

6	**CONTAINERIZE, STAGE, TRANSPORT AND DISPOSE OF DECONTAMINATION WASTES (note 13)**				
	Assumptions:				
	- 900 gallons of wash water generated from decontamination of CSA = 18 drums				
	- 400 gallons of wash water generated from decontamination of warehouse secondary containment areas outside of the CSA = 8 drums				
	- PPE, plastic sheeting, disposable cleanup equipment, consumables, etc. contained in 3 drums				
	- Waste characterization samples not necessary for wash/water disposal (per generator knowledge this is oily water)				
	Prime Contractor Costs				
	- Ensure drums are properly labeled, coordinate pick up and disposal (note 1)	Project Manager	$94	4	$376
	- Purchase 29 55-gallon drums (notes 9 & 10)	Drums @ $40 each (delivered)	$40	29	$1,160
	Subcontractor Costs				
	- Transfer drums of decon waste to trucks (note 2)	Foreman/labor/equipment (no charge, included in above costs)	$0	LS	$0
	- Transport drums to TSD for Treatment/Disposal (notes 5, 6 & 7)				
	Assumes 1 truck to transport 29 drums (80/trailer)				
	Drum Transportation at $800/load	Drum Transport	$800	1	$800
	Fuel Surcharge (per UDEQ request)	20%	$160	1	$160
	Estimated disposal/treatment cost cleanup debris drums- $80/drum	Disposal of drummed wash water	$80.00	3	$240
	Estimated disposal/treatment cost for oily water - $150/drum	Drum Handling Cost	$150.00	26	$3,900
	Activity 6. Subtotal				**$6,636**
7	**CLOSURE CERTIFICATION REPORT (note 1)**				
	Assumptions:				
	- CLOSURE CERTIFICATION REPORT certified by an Utah-registered PE and S-K				
	Prime Contractor Costs				
	- Compile field notes and photographs	Project Manager	$94	2	$188
		Project Engineer	$94	2	$188
	- Draft Closure Certification Report	Project Manager	$94	8	$752
		Project Engineer	$94	16	$1,504
	- Prepare closure certification statement	Sr. Project Engineer	$142	2	$284
	- Office Expenses	Drafting/Clerical	$400	1	$400
	- Miscellaneous Expenses	Copying/Postage	$100	1	$100
	Activity 7. Subtotal				**$3,416**

COST ESTIMATE ACTIVITIES SUMMARY			
1	PROJECT COORDINATION AND SCHEDULING		$3,732
2	MOBILIZE TO SITE AND PREPARE FOR CLOSURE/CLOSURE OVERSIGHT AND SHIP USED OIL CONTAINERS (note 12)		$20,080
3	DECONTAMINATE ONE CONTAINER STORAGE AREA (note 13)		$1,688
4	DECONTAMINATE THE OTHER STORAGE LOCATION IN WAREHOUSE (note 13)		$3,988
5	DECONTAMINATE CLEANUP EQUIPMENT (If Necessary) (note 13)		$800
6	CONTAINERIZE, STAGE, TRANSPORT AND DISPOSE OF DECONTAMINATION WASTES (note 13)		$6,636
7	CLOSURE CERTIFICATION REPORT (note 1)		$3,416
	TOTAL CLOSURE COST ESTIMATE		**$40,340**
	CONTINGENCY UDEQ OVERSIGHT	10%	$4,034
	CONTINGENCY FOR ANY OTHER COST OVERRUNS	20%	$8,068
	TOTAL CLOSURE COST ESTIMATE WITH CONTINGENCY		**$52,442**

Notes:

1 Prime Contractor Rates obtained from Trihydro Corporation 2008 Schedule of Charges, Laramie, WY
2 Subcontractor prices provided by Evans Environmental Construction, Glenwood, Iowa
3 Laboratory Subcontractor Rate Obtained From Test America, Pittsburgh, PA Quote
4 Off-spec Used Oil treatment/disposal unit cost obtained from Clean Harbors at $90 per 55 gallon drum.
5 Drummed wash water treatment/disposal unit cost obtained from Clean Harbors Grassy Mountiain, Utah Facility at $150/drum
6 Drummed cleanup debris disposal: $80 / 55 gallon drum.
7 Transportation of drums from Clean Harbors for disposal in their Utah facilities: $25 / 55 gallon drum with $250 minimum and $800 maximum
8 FedEx Overnight Shipping Costs
9 Eagle Peak Container's Inc. - Reconditioned 55 gal DOT Stamped steel drums quote $22.50 per container.
10 Eagle Peak Container's Inc. - Delivery costs for 50 Reconditioned 55 gal DOT Stamped steel drums quote $866 or $17.32 per drum.
11 Permit - General Operations page 7
12 Permit - page 16
13 Permit - page 17